

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



JAKUB MADEJ,

1:21-cv-01894 (WFK) (SJB)

Plaintiff,

v.

SYNCHRONY FINANCIAL,

Defendants.

AFFIDAVIT IN SUPPORT OF  
REQUEST FOR CLERK'S  
CERTIFICATE OF DEFAULT

I, Jakub J. Madej, declare as follows:

1. I am plaintiff in this action. I am over 18 years of age.
2. I submit this affidavit to establish facts sufficient to show the default of defendant Synchrony Financial in this case and to satisfy the requirements of Local Civil Rule 55.1.
3. This action was commenced pursuant to the Telephonic Communications Protection Act, 47 U.S.C. § 227, on April 6, 2021. The clerk issued a summons to defendant Synchrony Financial ("Synchrony") on April 15.
4. [L.Civ.R. 55.1(b)(3)] Synchrony was served with process on April 27, as appears fully from the affidavit of service filed in this case.
5. Synchrony had 21 days following service – or until May 19 – to appear and defend.
6. [L.Civ.R. 55.1(b)(2)] Synchrony did not appear within the time allowed. No counsel filed an appearance, as appears fully from the docket.
7. [L.Civ.R. 55.1(b)(2)] Defendant Synchrony has not answered or otherwise moved with respect to the complaint, and the time for defendant to answer or otherwise move has not been extended.
8. [L.Civ.R. 55.1(b)(2)] The time for Synchrony to answer or otherwise move with respect to the complaint herein has expired.

9. [L.Civ.R. 55.1(b)(1)] Synchrony is a Delaware corporation. Accordingly, it is not an infant nor an incompetent person nor in the military.
10. Complaint filed in this case seeks affirmative relief, namely monetary damages in the amount of \$1,144,000 for 572 separate violations of 47 U.S.C. § 227, as fully alleged in the complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 24, 2021  
New York, NY

Respectfully submitted,  
By: /s/ Jakub Madej  
Jakub J. Madej  
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MAY 24 PM 4:30

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★ MAY 24 2021 ★

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IN 21-cv-1894